

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE**

<b>AMANDA MICHEL, as parent and natural</b>	)	
<b>guardian of D.M., a minor, and</b>	)	
<b>AMANDA MICHEL, individually,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civ. No.: 3:20-cv-00246-TAV-HBG</b>
	)	
<b>UNION COUNTY BOARD OF EDUCATION;</b>	)	
<b>UNION COUNTY PUBLIC SCHOOLS;</b>	)	
<b>UNION COUNTY, TENNESSEE; JAMES E.</b>	)	
<b>CARTER, individually and officially as</b>	)	
<b>Director of Union County Board of Education;</b>	)	
<b>LARRY KERR, individually and officially as</b>	)	
<b>a teacher and head football coach of Union</b>	)	
<b>County High School; DEREK MARLOW,</b>	)	
<b>individually and officially as a teacher and</b>	)	
<b>football coach of Union County High School;</b>	)	
<b>and SHANE BROWN, individually and</b>	)	
<b>officially as a teacher and athletic director of</b>	)	
<b>Union County High School,</b>	)	
	)	
<b>Defendants.</b>	)	

**STIPULATION FOR VOLUNTARY DISMISSAL WITHOUT PREJUDICE AS TO  
DEFENDANTS UNION COUNTY PUBLIC SCHOOLS AND UNION COUNTY,  
TENNESSEE**

Pursuant to Fed. R. Civ. P. 41, Plaintiff, Amanda Michel, as parent and natural guardian of D.M., a minor, and Amanda Michel, individually, and Defendants, Union County Board of Education, James E. Carter, Larry Kerr, Derek Marlow, and Shane Brown enter this stipulation for dismissal without prejudice of Defendants Union County Public Schools and Union County, Tennessee. This dismissal is based on representation from Union County Board of Education that it is the proper governmental entity to respond to the allegations in the Complaint, that it operates Union County Public Schools, but Union County Public Schools is not an independent governmental or legal entity, and that Union County, Tennessee does not exercise oversight of

Union County Board of Education as it concerns the allegations in the Complaint. Accordingly, pursuant to Rule 41, Fed. R. Civ. P., Plaintiff voluntarily dismisses without prejudice Defendants Union County Public Schools and Union County, Tennessee.

Respectfully submitted this 23<sup>rd</sup> day of July, 2020.

s/Timothy L Baldrige

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s/Edward H. Trent

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*Attorneys for Defendants Union County  
Board of Education, James E. Carter, Larry  
Kerr, Derek Marlow, and Shane Brown*

### **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Stipulation for Voluntary Dismissal without Prejudice as to Defendants Union County Public Schools and Union County, Tennessee was filed with the Court using the CM/ECF system this 23<sup>rd</sup> day of July, 2020, which will provide copies to all parties of record.

/s/ Edward H. Trent

Edward H. Trent